

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
Plaintiffs and)	
Counterdefendants,)	
)	
v.)	C.A. No. 20-613 (SB)
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant and)	
Counterclaimant.)	

**PLAINTIFF AND COUNTERDEFENDANT’S MOTION FOR A LIMITED
EXEMPTION FROM THE STANDING ORDER REGARDING PERSONAL
ELECTRONIC DEVICES**

Plaintiffs and Counterdefendants Thomson Reuters Enterprise Center GmbH and West Publishing Corporation (“Thomson Reuters”) hereby moves for an order to exempt Dale Cendali, Yungmoon Chang, Eric Loverro, Miranda Means and Joshua Simmons from the District of Delaware’s May 17, 2024 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the “May 17, 2024 Standing Order”). In support of this Motion, Thomson Reuters states as follows:

1. The District of Delaware’s May 17, 2024 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require, *inter alia*, for visitors to place personal electronic devices in a locked pouch. Paragraph 4 of the May 17, 2024 Standing Order provides for certain exemptions to the Standing Order.

2. A pretrial conference is scheduled in this case for August 6, 2024 in Courtroom 2B.

3. Thomson Reuters requests Dale Cendali, Yungmoon Chang, Eric Loverro, Miranda Means and Joshua Simmons, co-lead counsel, be allowed to bring their electronic devices into the courtroom for use during the pretrial conference. Ms. Cendali, Ms. Chang, Mr. Loverro, Ms. Means and Mr. Simmons have been admitted *pro hac vice* in this matter, but do not have access to a state-issued bar card.

WHEREFORE, Thomson Reuters respectfully requests that the Court issue an order to exempt Ms. Cendali, Ms. Chang, Mr. Loverro, Ms. Means and Mr. Simmons from the May 17, 2024 Standing Order.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

OF COUNSEL:

Dale M. Cendali
Joshua L. Simmons
Eric A. Loverro
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
(212) 446-4800

Miranda D. Means
KIRKLAND & ELLIS LLP
200 Clarendon Street
Boston, MA 02116
(617) 385-7500

Jack B. Blumenfeld (#1014)
Michael J. Flynn (#5333)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
mflynn@morrisnichols.com

*Attorneys for Plaintiffs and
Counterdefendants Thomson Reuters
Enterprise Center GmbH and West Publishing
Corporation*

Daniel E. Laytin, P.C.
Christa C. Cottrell, P.C.
Alyssa C. Kalisky
Cameron Ginder
Vanessa Barsanti
Danielle O'Neal
Jonathan Emmanuel
Lexi Wung
Erin Bishop
Max Samels
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 862-2000

July 31, 2024

IT IS SO ORDERED this ____ day of _____, 2024.

The Hon. Stephanos Bibas